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*Counsel for Robert L. Geltzer, as
Chapter 7 Trustee for 1st Rochdale
Cooperative Group, Ltd.*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: :
1ST ROCHDALE COOPERATIVE GROUP, LTD. :
: :
Debtor :
----- X

**Bankruptcy Proceeding Chapter 7
Case No. 05-12086 (PCB)**

ROBERT L. GELTZER, as Chapter 7 Trustee for :
1ST ROCHDALE COOPERATIVE GROUP, LTD., :
: :
Plaintiff, :
: :
v. :
: :
GARY ALTMAN, RHODA BROWN, "JOHN DOE :
1" AS EXECUTOR OR ADMINISTRATOR OF :
THE ESTATE OF GEORGE CRETHAN, SAUL :
MILDWORM, JACK RASKIN, DAVID SMITH, :
FRANCIS CONNOLLY and JOAN KRAMER AS :
EXECUTORS OF THE ESTATE OF ALLEN :
THURGOOD, EDWARD YAKER, GREGORY :
WORTHAM and DAVID L. JOHNSON, :
Defendants. :
----- X

07 CV 7852 (DC)

**NOTICE OF THE TRUSTEE'S MOTION FOR AN ORDER
APPROVING STIPULATION OF SETTLEMENT BETWEEN THE TRUSTEE
AND DAVID L. JOHNSON PURSUANT TO
FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019**

PLEASE TAKE NOTICE that, upon the annexed affirmation of Robert A. Wolf, Esq., dated May 21, 2008 (the "Affirmation"), Robert L. Geltzer, the Chapter 7 Trustee (the "Trustee") for the above-captioned debtor, 1st Rochdale Cooperative Group, Ltd. , by his Counsel, Bryan Cave LLP, has submitted this motion (the "Motion") to the Honorable Denny Chin, United States District Judge, at the United States District Court, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 1020, New York, New York 10007, for an order, pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), approving a Stipulation of Settlement ("Stipulation") entered into between the Trustee and David L. Johnson ("Johnson"). A copy of the Stipulation is attached as Exhibit "A" to the Affirmation.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion shall be set forth in writing describing the basis therefor, filed with the Clerk's Office with a courtesy copy to Judge Chin's chambers and served on the undersigned so that it is received on or before June 9, 2008.

PLEASE TAKE FURTHER NOTICE that if an objection is filed, the Court will set a hearing on the Motion and such objection at a later date.

PLEASE TAKE FURTHER NOTICE that, no memorandum of law has been submitted herewith because pursuant to an endorsed letter of the Honorable Denny Chin, dated May 16, 2008, the requirement that the Trustee submit a memorandum of law in

accordance with Rule 7.1(a) of the Local Rules of the United States District Courts for the Southern and Eastern Districts has been waived.

Dated: New York, New York
May 21, 2008

BRYAN CAVE LLP

*Counsel for Robert L. Geltzer,
as Chapter 7 Trustee of 1st Rochdale Cooperative
Group, Ltd..*

By /s/ Robert A. Wolf
Robert A. Wolf, Esq. (RW 3419)
1290 Avenue of the Americas
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212-541-2000

To:

Those listed on the Service List, annexed as Exhibit "C" to the Application